## IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

_	)
In re:	) Chapter 11 (Subchapter V)
FREE SPEECH SYSTEMS, LLC,	) Case No. 22-60043 (CML)
Dilter	)
Debtor.	)

# TEXAS PLAINTIFFS' JOINDER TO THE OBJECTION OF THE CONNECTICUT PLAINTIFFS TO THE DEBTOR'S EMERGENCY MOTION TO APPROVE ASSUMPTION OF COMMERCIAL REAL PROPERTY LEASE WITH BCC UBC LLC

The Texas Plaintiffs<sup>1</sup> file this joinder ("<u>Joinder</u>") to the *Objection of the Connecticut Plaintiffs to the Debtor's Emergency Motion to Approve Assumption of Commercial Real Property Lease with BCC UBC LLC* [Docket No. 452] (the "<u>Objection</u>"), filed in response to *Debtor's Emergency Motion to Approve Assumption of Commercial Real Property Lease with BCC UBC LLC* [Docket No. 412] (the "<u>Motion</u>"). In support of this Joinder, the Texas Plaintiffs state as follows:

- 1. The Texas Plaintiffs join in, and hereby incorporate by reference, the arguments made by the Connecticut Plaintiffs in the Objection.
  - 2. The Debtor filed the Motion on January 31, 2023.
  - 3. The Connecticut Plaintiffs filed the Objection on February 13, 2023.
- 4. For the reasons stated in the Objection, the Texas Plaintiffs respectfully request that the Court deny the Motion and grant such other and further relief as it may deem just and proper.

<sup>&</sup>lt;sup>1</sup> The "<u>Texas Plaintiffs</u>" are Neil Heslin, Scarlett Lewis, Leonard Pozner, Veronique De La Rosa, and the Estate of Marcel Fontaine.

Dated: February 13, 2023

#### /s/ Jennifer J. Hardy

#### WILLKIE FARR & GALLAGHER LLP

Jennifer J. Hardy (Texas Bar No. 24096068)

600 Travis Street

Houston, Texas 77002 Telephone: 713-510-1700

Facsimile: 713-510-1799 Email: jhardy2@willkie.com

#### **AND**

Rachel C. Strickland (admitted *pro hac vice*) Stuart R. Lombardi (admitted *pro hac vice*)

Ciara A. Sisco (admitted pro hac vice)

787 Seventh Avenue

New York, New York 10019 Telephone: 212-728-8000 Facsimile: 212-728-8111

Email: rstrickland@willkie.com slombardi@willkie.com csisco@willkie.com

Bankruptcy Co-Counsel to the Texas Plaintiffs

#### MCDOWELL HETHERINGTON LLP

Avi Moshenberg (TX Bar No. 24083532)

1001 Fannin Street

**Suite 2400** 

Houston, Texas 77002 Telephone: 713-337-5580 Facsimile: 713-337-8850

Email: avi.moshenberg@mhllp.com

#### **AND**

### CHAMBERLAIN, HRDLICKA, WHITE, WILLIAMS & AUGHTRY, PC

Jarrod B. Martin (TX Bar No. 24070221)

1200 Smith Street

**Suite 1400** 

Houston, Texas 77002 Telephone: 713-356-1280 Facsimile: 713-658-2553

Email: jarrod.martin@chamberlainlaw.com

Bankruptcy Co-Counsel to the Texas Plaintiffs

#### **CERTIFICATE OF SERVICE**

I certify that on February 13, 2023 I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Jennifer J. Hardy
Jennifer J. Hardy